

1 JARED P. GREEN, ESQ.

(SPACE BELOW FOR FILING STAMP ONLY)

Nevada Bar No. 10059

2 McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

3 8337 West Sunset Road, Suite 350

Las Vegas, NV 89113

4 Telephone: (702) 949-1100

Facsimile: (702) 949-1101

5 jared.green@mccormickbarstow.com

6 JAMES S. BAINBRIDGE, ESQ.

Anticipated to be Admitted Pro Hac Vice

7 DRINKER BIDDLE & REATH LLP

One Logan Square

8 18th & Cherry Streets

Philadelphia, PA 19103

9 Telephone: (215) 988-2700

Facsimile: (215) 988-2757

10 james.bainbridge@dbr.com

11 Attorneys for Defendants WILTON REASSURANCE
LIFE COMPANY OF NEW YORK and WEST COAST
12 LIFE INSURANCE COMPANY

13 UNITED STATES DISTRICT COURT

14 DISTRICT OF NEVADA

15
16 ROSEBERRY FAMILY TRUST, by and through
its Trustee Robert Roseberry,

17 Plaintiff,

18 vs.

19 OMNI ADVISOR GROUP, INC., a North
20 Carolina corporation; SI100, LLC a North
21 Carolina limited liability company; BRIAN
PATRICK McGUANE, individually; Briane
McGuane, as Trustee of the SI 100 TRUST;
22 LINCOLN NATIONAL LIFE INSURANCE
COMPANY, an Indiana corporation; WILTON
23 REASSURANCE LIFE COMPANY OF NEW
YORK, a New York corporation;
24 TRANSAMERICA LIFE INSURANCE
COMPANY, an Iowa corporation; WEST COAST
25 LIFE INSURANCE COMPANY, a Nebraska
corporation; JOHN DOES I-X, inclusive; and ROE
26 ENTITIES I-X, inclusive,

27 Defendants.

CASE NO. 2:10-cv-0903-JCM-RJJ

**STIPULATION FOR PROTECTIVE
ORDER**

STIPULATION FOR PROTECTIVE ORDER

This Agreement ("Agreement") is made this 20 day of SEPTEMBER, 2010, by and among counsel for Plaintiff, the ROSEBERRY FAMILY TRUST (the "Trust") and Defendants, WILTON REASSURANCE LIFE COMPANY OF NEW YORK and WEST COAST LIFE INSURANCE COMPANY (collectively as "Defendants") (and the Trust and the Defendants are hereinafter referred to collectively as the "Parties"), each with the full express authority and consent of their respective clients to enter into and thereby bind such clients by this Agreement.

WHEREAS, certain documents and other materials sought and to be sought by the Parties in this action (the "Litigation") may contain sensitive, confidential, medical, financial, private and/or proprietary commercial, personal and trade secret information ; and

WHEREAS, the Parties wish to proceed with the production of the Confidential Materials (as that term is defined below) with suitable assurances of confidentiality.

NOW, THEREFORE, in consideration of the mutual promises contained herein and intending to be legally bound hereby, it is stipulated among the Parties that the above-referenced documents will be produce subject to the following provisions:

1. That the documents only be utilized for the purposes of the above-captioned matter and only be made available to the Parties, along with their counsel and any expert retained;

2. Should any pleadings or filings include as an exhibit the above referenced documents, said pleading or filing will be filed under seal with the Court to protect the integrity of the information found within the above referenced documents;

3. That upon completion of this case either through settlement or after trial, the Parties agree to return all originals and copies made of the above referenced documents, whether originals or copies are held by the specific party, their counsel, or their experts or witnesses that maybe testifying on that party's behalf. Said original and copies should be returned to counsel for ~~Transamerica Life Insurance Company~~ ^{DEFENDANTS} through their undersigned counsel; and

///

1 4. That any additional party named subsequent to this Stipulation, or entering
2 appearance subsequent to this Stipulation, will only be provided the above-referenced documents
3 after signing an addendum or amended stipulation to include that party prior to receiving an
4 copying the above referenced documents.

5 Dated: September 20, 2010

6 CHRISTENSEN JAMES & MARTIN

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9 By: _____

KEVIN B. CHRISTENSEN, ESQ.
Nevada Bar No. 175
WESLEY J. SMITH, ESQ.
Nevada Bar No. 11871
7440 West Sahara Avenue
Las Vegas, NV 89117
Attorneys for Plaintiff
ROSEBERRY FAMILY TRUST

 Dated: September 17, 2010

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

By: _____

JARED P. GREEN, ESQ.
Nevada Bar No. 10059
8337 West Sunset Road, Suite 350
Las Vegas, NV 89113
Attorneys for Defendants
WILTON REASSURANCE LIFE
COMPANY OF NEW YORK and WEST
COAST LIFE INSURANCE COMPANY

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18 IT IS SO ORDERED.

19 _____
20 UNITED STATES MAGISTRATE JUDGE
21 SEPTEMBER 27, 2010
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